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May 3, 2010

VIA ECF

Hon. Steven M. Gold, Chief U.S.M.J.
United States District Court
Eastern District of New York
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *American General v. Salamon et. al*
Index No.: 09 cv 5428 (ECF)
Our File No.: 07478.00456

Dear Magistrate Judge Gold:

We represent the plaintiff in the referenced action. Pursuant to Your Honor's instructions at the initial hearing conference held on April 29, 2010 and the minute entry filed via ECF the following day, we write to inform the Court that American General is not prepared to resolve the case on the grounds discussed at the initial hearing conference at this time.

At the conference, Mr. Lipsius, counsel for the defendants, stated that his client did not make any material financial misrepresentations on her application for life insurance and referred to a piece of property located in Romania as the basis for the financial representations his client made in connection with the policy at issue here. Despite American General's repeated requests, dating back to February 5, 2009, for information which would refute its allegations of material misrepresentations and avoid unnecessary litigation, Mr. Lipsius' representations at the April 29, 2010 conference were the first of its kind. American General welcomes Mr. Lipsius to provide it with the documents he claims to have in his possession regarding Ms. Salamon's alleged ownership in this property, but American General cannot proceed to a settlement conference without any evidence that Mr. Lipsius' representations are truthful and accurate. Upon receiving and verifying such information, American General would be happy to revisit the idea of proceeding with an early settlement conference with the defendants.

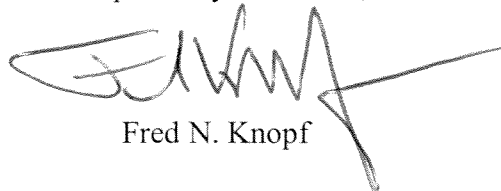
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Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Fred N. Knopf', with a long horizontal stroke extending to the right.

Fred N. Knopf

FNK:ni

cc: Ira S. Lipsius